

Aleksandr Felstiner  
Levy Ratner, P.C.  
80 8<sup>th</sup> Ave., 8<sup>th</sup> Fl.  
New York, NY 10011  
212-627-8100  
[afelstiner@levyratner.com](mailto:afelstiner@levyratner.com)  
Bar: 281906  
*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHEYNE ANDERSON, JESUS CASTELLANO,  
HANNAH MIRZA, KATHLEEN O'BEIRNE, SETH  
TAYLOR, WILLIAM VAN DER LAAR, MARK  
WESLEY DUDLEY, RACHEL WESTRICK, JIAJUN  
XU, INDIVIDUALLY AND ON BEHALF OF ALL  
OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:25-cv-03268-BLF

**DECLARATION OF ALEXIS S.  
BOYD PURSUANT TO 28  
U.S.C. § 1746 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
LEAVE TO AMEND**

Class Action

Date: October 20, 2025

Time: 9:00 a.m.

Dept.: Courtroom 1

Judge: Hon. Beth Labson Freeman

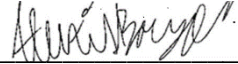
I, Alexis Boyd, declare as follows:

1. I am an associate attorney at Levy Ratner, PC, with offices at 80 8<sup>th</sup> Ave., 8<sup>th</sup> Fl., New York, NY 10011, representing Plaintiffs in the above-captioned action.
2. The facts contained in the following declaration are known to me of my own personal knowledge, and if called upon to testify, I could and would competently do so.
3. A true and correct copy of Plaintiffs' [Proposed] Second Amended Complaint is attached as Exhibit 1 to this Declaration.
4. I filed or directed staff to file EEOC charges on behalf of all the Named Plaintiffs in this action. Charges were filed on the following dates, in the following EEOC offices:
  - a. Cheyne Anderson, charge filed January 21, 2025 in Seattle field office
  - b. Jesus Castellano, charge filed December 18, 2024 in Atlanta field office
  - c. Hannah Mirza, charge filed December 6, 2024 in San Francisco field office
  - d. Kathleen O'Beirne, charge filed December 12, 2024 in San Francisco field office
  - e. Seth Taylor, charge filed December 20, 2024 in Seattle field office
  - f. William Van Der Laar, charge filed December 30, 2024 in San Francisco field office
  - g. Mark Wesley Dudley, charge filed December 17, 2024 in San Francisco field office
  - h. Jiajun Xu, charge filed December 12, 2024 in San Francisco field office
5. I filed or directed staff to file EEOC charges on behalf of Tina Liu, Evan McElheny, Zachary Siegel, Eric Spishak-Thomas, and Alec Story. Charges were filed on the following dates, in the following EEOC offices.
  - a. Tina Liu, charge filed December 30, 2024 in New York City field office
  - b. Evan McElheny, charge filed December 6, 2024 in New York City field office
  - c. Zachary Siegel, charge filed December 30, 2024 and moved to New York City field office
  - d. Eric Spishak-Thomas, charge filed December 3, 2024 in New York City field office
  - e. Alec Story, charge filed November 20, 2024 in Newark field office

6. The Equal Employment Opportunity Commission issued Notice of Right to Sue (NRTS) letters to the Named Plaintiffs on the dates below. Those letters are included in Attachment A to Exhibit 1 of this Declaration.
  - a. Anderson, NRTS issued January 30, 2025
  - b. Castellano, NRTS issued March 28, 2025
  - c. Mirza, NRTS issued January 13, 2025
  - d. O'Beirne, NRTS issued January 13, 2025
  - e. Taylor, NRTS issued January 13, 2025
  - f. Van Der Laar, NRTS issued January 13, 2025
  - g. Wesley Dudley, NRTS issued January 13, 2025
  - h. Xu, NRTS issued January 13, 2025
7. As of April 17, 2025, EEOC was still investigating the charges filed by Liu, McElheny, Siegel, Spishak-Thomas, and Story. The EEOC had not issued NRTS letters to any of them at that time.
8. I requested or directed staff to request NRTS letters on behalf of Liu, McElheny, Siegel, Spishak-Thomas, and Story, on July 18, 2025.
9. EEOC issued NRTS letters to Liu, McElheny, Siegel, Spishak-Thomas, and Story, on the dates below. Those letters are included in Attachment A to Exhibit 1 to this Declaration.
  - a. Liu, issued July 18, 2025
  - b. McElheny, issued July 18, 2025
  - c. Siegel, issued July 21, 2025
  - d. Spishak-Thomas, issued July 18, 2025
  - e. Story, issued July 29, 2025

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 10, 2025, in New York, NY.

By:  (Signature)  
Alexis S. Boyd  
Levy Ratner, P.C.  
80 8<sup>th</sup> Ave., 8<sup>th</sup> Fl.  
New York, NY 10011  
[aboyd@levyratner.com](mailto:aboyd@levyratner.com)  
212-627-8100